

**REDACTED FOR PUBLIC INSPECTION**

October 16, 2018

**VIA HAND DELIVERY**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Room TW-B204  
Washington, DC 20554

Re: *Securus Technologies Inc. and Inmate Calling Solutions, LLC,  
Consolidated Applications for Consent to the Transfer of Control of  
Licenses and Authorizations, WC Docket No. 18-193*

Dear Ms. Dortch:

Inmate Calling Solutions, LLC d/b/a ICSolutions (“ICS”) submits its final production of documents responsive to the Wireline Competition Bureau’s Information and Document request (“Information Request”) dated September 11, 2018 in connection with the above-referenced transaction and in accordance with the Protective Order in this docket (the “Document Production”).<sup>1</sup> Because ICS is producing materials that contain information that meets the requirements for treatment as “Confidential” or “Highly Confidential,” ICS is filing these documents pursuant to the staff’s instructions and the procedures established in the Protective Order and in the Information Request.<sup>2</sup>

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<sup>1</sup> *Securus Technologies Inc., and Inmate Calling Solutions, LLC, Consolidated Applications for Consent to the Transfer of Control of Licenses and Authorizations*, Protective Order, WC Docket No. 18-193, DA No. 18-938 (rel. Sept. 11, 2018) (“Protective Order”).

<sup>2</sup> Consistent with the Protective Order, *id.* at ¶ 3, ICS obtained written approval from Commission staff to designate certain material as Highly Confidential. Pursuant to discussions with staff, the provided documents, unless specifically reviewed and downgraded, have been classified as “Highly Confidential.” Notwithstanding this default classification, ICS is not asserting Highly Confidential status for any documents that have been publicly released (which would be Public) or for third party materials that are copyrighted (which would be considered Confidential).

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Enclosed please find one hard drive and one disc containing additional load files associated with this production of documents and another disc containing ICS's privilege log associated with its document production, tagged as "Highly Confidential." An updated production index also is attached, tagged as "Highly Confidential." In addition, two copies of this letter and one copy of the disc containing the privileged log are being delivered to the WCB staff. One copy of the hard drive and the disc containing additional load files is being delivered to the FCC's e-Discovery vendor via messenger and/or its secure FTP site. A redacted copy of this submission also is being filed electronically through the Commission's Electronic Comment Filing System.

ICS has made diligent efforts to ensure that none of the material it is submitting herewith is privileged under the attorney-client privilege or attorney work product doctrine. To the extent that any privileged materials may have been inadvertently produced, such production does not constitute a waiver of any applicable privilege. ICS requests that any privileged materials inadvertently produced be returned to ICS as soon as such inadvertent production is discovered by any party, and reserves all rights to seek return of any such documents.

If you have any questions arise concerning this submission, please contact the undersigned.

Very truly yours,



Howard M. Liberman

*Counsel to Inmate Calling Solutions, LLC  
d/b/a ICSolutions*

Enclosures

**REDACTED**

**Production Index**

**REDACTED**

**Hard Drive and CDs**